



December 11, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of Ex Parte Communication, ET Docket No. 04-186

Dear Ms. Dortch:

On December 7, 2018, Robert Weller and the undersigned, both of the National Association of Broadcasters (NAB), met with Julius Knapp, Ira Keltz, Martin Doczkat and Matthew Hussey of the Office of Engineering and Technology. During this meeting, NAB discussed its petition for reconsideration of the Office of Engineering and Technology's (OET's) approval for Nominet UK (Nominet) to operate its television white spaces (TVWS) database system to provide service to the public.¹

NAB appreciates OET's ongoing efforts to ensure that Nominet's database provides accurate channel information, which is the cornerstone of the TVWS interference protection regime. As recently as December 6, the Nominet database continued to report incorrect channel availability information. We remain concerned that Nominet seeks merely to address errors that other parties identify, rather than taking responsibility for proving its qualifications. NAB proposed that Nominet could demonstrate that commitment by hiring a broadcast consulting engineer to conduct a review of Nominet's database to identify and help resolve any outstanding issues.

Finally, NAB urges the Commission to re-evaluate its procedures for certification to determine how it originally certified a database administrator with such obvious and significant errors in its data, apparently including incorrect channel information for at least 200 full power television stations.²

¹ *Office of Engineering and Technology Announces the Approval of Nominet UK's White Space Database System for Operation*, Public Notice, ET Docket No. 04-186, DA 18-966 (Sept. 19, 2018).

² *Petition for Reconsideration of the National Association of Broadcasters at 3-4*, ET Docket No. 04-186 (Oct. 19, 2018).

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Patrick McFadden", with a long horizontal flourish extending to the right.

Patrick McFadden
Associate General Counsel,
National Association of Broadcasters

cc: Julius Knapp
Ira Keltz
Martin Doczkat
Matthew Hussey